

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT NEW YORK**

-----X  
DEBORAH D. PETERSON,  
Personal Representative of the Estate  
of James C. Knipple (Dec.), et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN, et al.,

Defendants.  
-----X

Case No. 18 Misc. 302(BSJ)

(Civil Action Nos. 01-2094 (RCL)  
and 1-2684 (RCL) (D.D.C.))

FILED UNDER SEAL CONTAINS  
CONFIDENTIAL MATERIAL  
SUBJECT TO PROTECTIVE ORDER

**EX PARTE APPLICATION FOR A  
LETTER OF REQUEST**

UPON the annexed affirmation of Liviu Vogel, Esq., dated January 26, 2009, and the exhibits annexed thereto, and upon all the prior pleadings and proceedings heretofore had herein,

Plaintiffs, through their attorneys Salon Marrow Dyckman Newman & Broudy LLP hereby apply ex parte for an Order a Letter of Request for the taking of evidence by testimony of employees of Banca UBAE SpA, addressed to Ministry of Foreign Affairs, located at D.G.I.E.P.M. Office IV Piazzale della Farnesina, 1-001194 Rome, Italy, who is the appointed officer for the purpose of receiving such requests in Italy pursuant to the Hague Convention of 18 March, 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters. A proposed form of Order and Letter of Request is submitted herewith.

Dated: New York, New York

January 26, 2009

SALON MARROW DYCKMAN NEWMAN & BROUDY LLP

By: 

Liviu Vogel (LV7552)  
Attorney for Plaintiffs  
292 Madison Avenue, 6<sup>th</sup> Floor  
New York, NY 10017  
Tel: (212) 661-7100